

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOANN C. RIVERA,

Plaintiff,

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

-against-

THE CITY OF NEW YORK, VINCENT C. GREANY,
as Inspector 32nd Precinct; EMMA M. RODRIGUEZ, as
Lieutenant 32nd Precinct; JESUS PASTRANA, as
Lieutenant 32nd Precinct; MASHIEL M. SANTOS, as
Sergeant 32nd Precinct; DENIS J. O'MAHONEY, as
Sergeant 32nd Precinct; WILSON O. RAMOS, as
Sergeant 32nd Precinct; GAETANO V. BELLO, as
Medical Doctor Pregnancy Medical District and APRIL
BANNERS, as Senior Police Administrative Aide,
Pregnancy Medical District, each sued individually and in
their official capacities as employees of Defendant CITY
OF NEW YORK,

22-CV-5699 (BMC)

Defendants.

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PLEASE TAKE NOTICE that, upon the Statement of Undisputed Material Facts pursuant to Local Rule 56.1, dated April 26, 2023, the Affirmation of Sonya Gidumal Chazin in Support of Defendants' Motion for Summary Judgment, dated April 26, 2023, and the exhibits annexed thereto, and Defendants' Memorandum of Law in Support of Their Motion for Summary Judgment, dated April 26, 2023, and upon all prior pleadings and proceedings herein, Defendants will move this Court, before the Honorable Brian M. Cogan, United States District Judge, Eastern District of New York, at the courthouse thereof, located at 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be determined by the Court, for an order and judgment, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting summary judgment to Defendants, dismissing the complaint in its entirety, dismissing all claims in this action, entering judgment for

Defendants, and granting Defendants costs, fees, and disbursements together with such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to this Court's briefing schedule, set on April 12, 2023, Plaintiff's opposition, if any, shall be served on or before May 10, 2023, and Defendants' reply papers, if any, shall be served on or before May 17, 2023.

Dated: New York, New York
April 26, 2023

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel of the
City of New York
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By: /s/Sonya Gidumal Chazin
Sonya Gidumal Chazin
Assistant Corporation Counsel

To: Eric Sanders, Esq. (via ECF)